

G.W. Vs. Northbrook Industries, Inc.

Page 14	Page 16
1 Q What documents were those?	1 A In Kennesaw.
2 A The -- some paperwork started with an "I."	2 Q Kennesaw. Okay. David or Daniel?
3 It was like G.W. versus. And I reviewed some text	3 A Daniel.
4 messages and stuff like that.	4 Q And, Ms. G.W., just to let you know, I'm
5 Q Okay. Can you state your full name for the	5 asking you about where your siblings live so
6 record, please?	6 if -- when this case goes to trial, it's in what's
7 A G.W.	7 called the Northern District of Georgia. And so we
8 Q Have you ever been known by any other name?	8 get a jury pool to select from. And they pick from a
9 A G.W.	9 bunch of different counties up in North Georgia.
10 Q And how would that be spelled?	10 So I have to know who your relatives are.
11 A X-X.	11 So just to make sure they don't get on the jury for
12 Q What's your date of birth?	12 the case.
13 A 07/29/1999.	13 A Okay.
14 Q And where were you born?	14 Q Where does your mother live now?
15 A In Atlanta, Georgia.	15 A In Athens, Georgia.
16 Q What's your current address?	16 Q Okay. Do you have any other siblings
17 A 2360 West Broad Street, Athens, Georgia	17 besides your two brothers?
18 30606.	18 A Yes. I have five other brothers.
19 Q How long have you lived on West Broad	19 Q You have seven brothers total?
20 Street?	20 A Yes.
21 A A year and a half.	21 Q Are -- the other five, are they all over 18?
22 Q Who lives with you?	22 A Yes.
23 A My fiance.	23 Q Do any of them live in Georgia?
24 Q And what is your fiance's name?	24 A Three of them do.
25 A Dominque Thomas.	25 Q If you can give me the names and location
Page 15	Page 17
1 Q Is he from Georgia?	1 for the three that do live in Georgia.
2 A Mm-hmm. Yes.	2 A Javell Pryor.
3 Q And back in June and July of 2017, where did	3 THE REPORTER: And, Counsel, I
4 you live?	4 apologize for the interruption. Could you spell those
5 A 430 Williford Street, Commerce, Georgia --	5 for me?
6 Q And who --	6 MR. STORY: Yes.
7 A -- 30529.	7 BY MR. STORY:
8 Q Sorry about that.	8 Q And when -- yes. And if you don't mind.
9 A That's okay.	9 A Okay. J-A-V-E-L-L Pryor, P-R-Y-O-R. Robert
10 Q Who did you live with at that address?	10 Wilson. R-O-B-E-R-T Wilson, W-I-L-S-O-N. And I think
11 A My mother and my two brothers.	11 those -- those at the only two.
12 Q And what's your mom's name?	12 Q Okay. And where does Mr. Pryor live?
13 A Chanda Santana. C-H-A-N-D-A.	13 A In Lithonia.
14 Q I think you also said your two brothers.	14 Q And what about Robert Wilson?
15 A Yes.	15 A In Austell.
16 Q What are their names?	16 Q Do you have any sisters?
17 A David and Daniel Wilson.	17 A Nn-mm. No.
18 Q Do they still live at that address?	18 Q Do you have a father? Stepfather?
19 A No. They don't.	19 A Father. Robert Wilson.
20 Q Does your mom?	20 Q And does he live in Georgia?
21 A No.	21 A No.
22 Q Are they still -- are your brothers still in	22 Q When did you get engaged?
23 Georgia?	23 A On July 29th this year, 2022.
24 A One of them is.	24 Q Twenty-third birthday?
25 Q Where is he at in Georgia?	25 A Yes.

Page 18		Page 20
1 Q That was a pretty good birthday present, I		1 A No.
2 guess.		2 Q Are you currently a member of any civic
3 A Yes.		3 groups, organizations, churches?
4 Q When are y'all planning on getting married?		4 A The Athens Church.
5 A On July 28th of 2024.		5 Q Is that a nondenominational?
6 Q Okay. Are you currently employed, Ms. G.W.?		6 A I'm not sure.
7 A Yes. I am.		7 Q And what does your fiance, Mr. Thomas, do?
8 Q What do you do for a living?		8 A He's a cook at Zaxby's.
9 A A nanny.		9 Q How long ago did you meet him?
10 Q Do you nanny for a family in Athens?		10 A Three years ago.
11 A Yes. I do.		11 Q So other than being a nanny for that family
12 Q Tell me about what your hours are, like in a		12 in Athens, do you do anything else for income?
13 week.		13 A No.
14 A 6:15 a.m. to about 8:30 a.m. And then 2:00		14 Q When did you start that job?
15 p.m. to about 5:00 p.m.		15 A I started October 13, 2022.
16 Q And you get paid hourly?		16 Q It's a good memory you've got. How do you
17 A Daily.		17 remember that day?
18 Q What's your daily rate?		18 A I forgot how I remember. I think it was,
19 A 140.		19 like, I had just bought a new car. So I remember the
20 Q Have you previously been married?		20 day that I could start.
21 A No.		21 Q I got you. Prior to October of 2022, what
22 Q Tell me about your educational background,		22 were you doing for work?
23 and just start at high school.		23 A I was a lead teacher at a daycare called
24 A I have a high school diploma. And then I		24 Childcare University Center.
25 went to cosmetology school and completed cosmetology		25 Q Was that a full-time job?
Page 19		Page 21
1 school.		1 A Yes.
2 Q Where did you go to high school?		2 Q Going back to that nanny position you've
3 A Commerce High School.		3 got, is it five days a week?
4 Q And then what -- do you remember what the		4 A Four days a week.
5 cosmetology school was called?		5 Q What ages are the kids you're taking care
6 A Paul Mitchell The School of Orlando.		6 of?
7 Q Does that mean it was in Orlando, Florida?		7 A Nine and 11.
8 A Yes.		8 Q Ms. G.W., do you have any prior criminal
9 Q Did you do it online? Or did you actually		9 history?
10 go in person?		10 A I have a petty theft charge.
11 A In person.		11 Q When did that occur?
12 Q When did you -- did you get a certificate or		12 A Around I think May of 2018.
13 degree from there?		13 Q And where was it at?
14 A A certificate.		14 A In Altamonte Springs, Florida.
15 Q What was the certificate? Is it --		15 Q So the allegations in this case arise in
16 A For completion.		16 June and July of 2017. My understanding is that you
17 Q Do you remember what year you got that		17 were recovered, found, located by the FBI on or about
18 certificate?		18 July 23, 2017?
19 A 2018.		19 A Correct.
20 Q Do you use that license at all?		20 Q I want to just, kind of, get an idea of
21 A Nn-mm.		21 where you've lived since that time to the present if
22 THE REPORTER: Is that a yes or a no?		22 you could, sort of, walk me through.
23 THE WITNESS: No.		23 A Okay. So I had went to a shelter for five
24 BY MR. STORY:		24 days. And I moved to Orlando, Florida, on July 29th
25 Q It's all right. Do you have any children?		25 of 2017 that year. And I lived there until about

<p style="text-align: right;">Page 54</p> <p>1 A Just one time. 2 Q Who's Kat, K-A-T? And just to give you a 3 reference, I'm looking at that last full paragraph. 4 It says, "Z," "Kiki," "Kat," and "Shay." 5 If I would have read the next sentence, I 6 would have answered my own question. 7 A Oh. She's PD's sister. 8 Q Okay. Did she perform commercial sex 9 services? 10 A Not to my knowledge. 11 Q Did she drive you around to hotels? 12 A No. She prepared us for the day. Did our 13 hair and stuff. 14 Q Did she ever provide you with clothes to 15 wear? 16 A Yes. 17 Q If you can turn to the next page, it's 18 008881. And it's the first full paragraph. I'm going 19 to read it out loud for the record and ask you a few 20 questions. 21 "G.W. stated she worked commercial sex acts 22 mostly at night either by walking the street and 23 meeting clients or by meeting clients on internet 24 dating sites such as Plenty of Fish.com. G.W. stated 25 she would work all night.</p>	<p style="text-align: right;">Page 56</p> <p>1 percent came from Backpage. And you might have had 2 other sources. So if you could just, kind of, break 3 down how you got -- and I'm going to call them 4 customers. 5 A Okay. 6 Q But how you got customers during that June 7 and July time frame? 8 A Are we focusing on United Inn, 9 like -- like -- 'cause I had stayed there three 10 different times. And by the third time, it was a 11 different way of me getting them through the process 12 'cause I had been there longer and figured out 13 different ways. 14 So the first time I would say was 80 15 percent. Like, the first three -- from June 23rd to 16 June 26th at the United Inn, the very first day, 17 Friday, I would say 80 percent walking and meeting 18 them on the street. 19 By that Sunday I would say 50 percent from 20 clients that would pull up in the parking lot or that 21 I can find in the hotel. And I would say 30 percent 22 from traveling on the sidewalk. I met them that way. 23 And maybe 20 percent on POF. 24 By the second time I would say 70 percent in 25 the parking lot, 20 percent POF, 10 percent walking.</p>
<p style="text-align: right;">Page 55</p> <p>1 "Then PD a/k/a Z a/k/a Zaccheus Obie or Kiki 2 a/k/a Kikia Anderson would take her and Shay LNU by 3 vehicle to Miss B's house identified as Natonya Moody 4 and the house is the 4544 Pine Road, Forest Park, 5 Georgia, residence, where she would sleep for a few 6 hours and eat some food. G.W. stated PD collected the 7 money she made from clients." 8 So the first part of this paragraph -- and 9 that's the end of this paragraph. The first part of 10 this paragraph talks about walking the street and 11 meeting clients. I've been over to Memorial Drive a 12 few times. Were you walking Memorial Drive? 13 A At one point, yes. 14 Q Did you stay in any other hotels on Memorial 15 Drive that you're aware of? 16 A No. Not that I'm aware of. 17 Q If you could -- and I hate to ask you this, 18 but I have to. If you could, kind of, break down your 19 clientele and how you got them, and the buckets or the 20 categories I'm talking about is: Walking the street; 21 meeting at strip clubs; or online dating sites which 22 would include Plenty of Fish, Backpage. 23 A Can you repeat the question for me? 24 Q What I'm trying to understand is if 20 25 percent of your clientele came from the street, and 50</p>	<p style="text-align: right;">Page 57</p> <p>1 And by the third time, I would say 80 2 percent POF. 3 Q Is POF Plenty of Fish? 4 A Yes. Plenty of Fish. 5 Q And third time you said what percent of POF? 6 A Eighty. 7 Q Would -- are you aware of Mr. Obie or his 8 associates sending clients to the location that you 9 were at? 10 A I vaguely remember that. 11 Q That's all the questions I have on that 12 exhibit. Let's get through this next exhibit, and 13 then we can take a break. This is going to be pretty 14 quick though. 15 I'm going to mark as Defendant's Exhibit 5 16 various pages of plaintiff's document production 17 that's a call log from Ms. G.W.'s phone between June 18 and July of 2017. 19 (Defendant Exhibit 5 was marked for 20 identification.) 21 All right. And, Ms. G.W., I'll tell you, 22 for this I really am just trying to figure out who a 23 lot of these people are. 24 A Okay. 25 Q So I'm going to be pretty quick. And we're</p>

<p style="text-align: right;">Page 58</p> <p>1 not going to -- I'm not going to go through every one. 2 I promise you. All right. We're on 12183. There's a 3 T somewhere. Number 41. Do you see that? 4 A Yes. 5 Q Who is T? 6 A Not sure. 7 Q What does that -- did you save contacts with 8 asterisks? See that asterisk to the right of T? 9 A No. I didn't. 10 Q Okay. You see Ki with a heart? K-I? 11 A Kiki. 12 Q That's Kiki? 13 A Yes. 14 Q And is that Kikia Anderson? 15 A Yes. 16 Q What about 47? Who's Snow? 17 A Snow was a man that I had met at the 18 American Inn. 19 Q And PD is Zaccheus Obie? 20 A Correct. 21 Q All right. Going to the next page, there is 22 a Pete, 82. Who is Pete? 23 A I'm not sure. 24 Q How about 79? Who is Robert? 25 A Could have been my dad. I think that's my</p>	<p style="text-align: right;">Page 60</p> <p>1 who tried to -- like, he was screaming at me and Shay 2 at one point because he wanted to be let up into our 3 hotel room. 4 Q All right. Going to the next page, 12188, 5 240. Who is Cedric Byrd? 6 A My older brother. 7 Q And he does not live in Georgia. Correct? 8 A No. 9 Q 235, who is Suh, which is S-U-H? 10 A 235. Alyssa. No. That was my old friend, 11 Presteyona. 12 Q What was her name? 13 A Presteyona. P-R-E-S-T-E-Y-O-N-A. It's real 14 complicated. 15 Q I'm just, like, so you just made my mind do 16 a -- go through a roller coaster with that spelling. 17 A You could put Presty. That's what I used to 18 call her. 19 Q Is she a friend from Commerce? 20 A Yes. 21 Q Okay. Who is 239, Christian Santana? 22 A My older brother. 23 Q So are you the youngest sibling? 24 A I have two little brothers. 25 Q Two little brothers, five older brothers?</p>
<p style="text-align: right;">Page 59</p> <p>1 dad's number. That is my dad's number. 2 Q All right. And then go to the next page 3 which is 12186. Where is it? 152, Kodak. Who is 4 Kodak? 5 A He was a pimp. 6 Q How do you know he was a pimp? 7 A Because he had told us that he was. 8 Q And how did you meet him? 9 A I met him first at the United Inn and 10 Suites. And he ended up also being at that Travelodge 11 I was at. 12 Q Do you know what Kodak's real name was? 13 A No. I don't. He looked like Kodak Black. 14 That's why I called him that. 15 Q Did he appear to know the Obies? 16 A No. 17 Q So if you met, like meeting him and he's a 18 pimp. You meet him at United Inn and Suites, I mean, 19 is he trying to, like, recruit you? 20 A Yes. 21 Q And what did you tell him? 22 A No. That we already had a daddy. 23 Q Okay. 179. Who is Crazy? 24 A I'm not 100 percent sure, but I think that 25 this -- this man who I met at United Inn and Suites</p>	<p style="text-align: right;">Page 61</p> <p>1 A Yes. 2 Q Y'all have a full-on basketball team. 3 What about 241, Malik, which is M-A-L-I-K, 4 Lik, L-I-K? 5 A An old friend from school. 6 Q And then right under that, let me spell it 7 for the record. It's 242 saved as back nogbeen 8 iammoney. That's spelled B-A-C-K, space, "N" as in 9 Nancy, O-G, "B" as in boy, E-E, "N" as in Nancy, space 10 iammoney, one word spelled out it should be. 11 Who is that? 12 A I'm not sure. 13 Q Okay. Who is James Wilson? 14 A My brother. 15 Q Okay. And then 248, Herb. Who's Herb? 16 A I'm not sure. 17 Q That's H-E-R-B for the record. 18 All right. Going to the next page, 12189, 19 258, there's an outgoing call to Holly. Who's Holly? 20 A Not sure. 21 Q Then 269, missed call from Kristin. Who is 22 Kristin? 23 A Alyssa's cousin. Or A.G.'s cousin. Sorry. 24 Q That's okay. And just to let you know, Ms. 25 G.W., because I know that you've got legitimate rights</p>

<p style="text-align: right;">Page 70</p> <p>1 Q Why is she S-I-H-W? 2 A I'm not sure what that stood for. 3 Q And this is a text from you to her that 4 says, "Maybe we shouldn't have told everyone we want 5 to be strippers." 6 A Correct. 7 Q Then y'all talk about it. And my question, 8 I want to go to the next page. And if you go to 9 the -- towards the middle, it's a message from A.G. 10 that says, "And you're the one that came up with it. 11 Not me." Do you see that? 12 A Okay. And that's from A.G. or me? 13 Q That's from A.G. 14 A Okay. 15 Q Is it fair to say that it was your idea to 16 go to Atlanta and strip for money? 17 A I wouldn't necessarily say it was my idea. 18 Q Is it you and A.G., kind of, working or 19 talking together about it? 20 A Yes. Also with the mixture of the glamorous 21 way Payton presented it to us. 22 Q And tell me, how did she present it to you? 23 A She had this photo on her phone of her 24 laying on a bed with thousands of dollars around her. 25 That was what the photo. When I think back to how she</p>	<p style="text-align: right;">Page 72</p> <p>1 Q And I know I'm not expecting you to tell me 2 a specific date, but generally speaking when did you 3 witness that occur? 4 A You -- okay. So you're asking what time I 5 witnessed him begin to be physical with people? 6 Q Yes, ma'am. 7 A I would say the second time that I got back. 8 Q So that was in July? 9 A Yes. 10 Q Who was he physical with? 11 A With Shay. 12 Q Was he ever physical with you? 13 A The day that I was rescued, like he was in 14 the middle of a conversation where he was starting to 15 get very upset because I had got robbed that day. And 16 he was very mad that I didn't have any money. 17 Q So at that time, June 22nd, June 23rd, it is 18 fair to say you did feel like you could have left 19 whenever you wanted to? 20 A Physically, yes. But we were in, I would 21 say, like, an emotional -- like a chain at that point. 22 Like we had went and did something we should have 23 never did. So we were mentally still attached to 24 this. Like, we felt bound to him now. Like, we made 25 a choice we couldn't turn back from.</p>
<p style="text-align: right;">Page 71</p> <p>1 presented the situation, that's what we were inspired 2 by. 3 Q That's all the questions I have for that. 4 All right. I'm going to hand you what I'm marking as 5 Defendant's Exhibit 7, which is Bates stamped 6 Plaintiff 012457. 7 (Defendant Exhibit 7 was marked for 8 identification.) 9 So Madison Waldrop, she's your friend from 10 home? 11 A Yes. 12 Q If you look down about just up midway on 13 June 23, 2017, so this says 3:22 Universal Time. 3:23 14 Universal Time, which means that's really 10:23 p.m. 15 on June 22nd. And it says, it's a message from you to 16 her that says, "Yes boo. Ima send you my location 17 when we get there. It's basically like a job. We 18 have the choice to leave whenever we want." End of 19 message. 20 My question for you, Ms. G.W., is, was your 21 understanding between June and July of 2017 that you 22 had the option to leave whenever you wanted to? 23 A Not at one point. 24 Q And at what point was that? 25 A When PD became physical with other girls.</p>	<p style="text-align: right;">Page 73</p> <p>1 Q And tell me about the financial 2 arrangements. My understanding -- and I've read 3 thousands and thousands and thousands of pages of this 4 investigative file. My understanding is that Mr. Obie 5 would collect all of your money, and you would keep 6 none of it. 7 A Correct. 8 Q How did you -- how did that sit with you? I 9 mean, tell me how that occurred. 10 A He was telling us that he was basically 11 collecting the money and holding it for us because he 12 wanted to get us a house. So we were under the 13 impression basically, like, we were putting it in the 14 bank pretty much. 15 Now looking back I see he was keeping our 16 money. But at the time we thought we were giving it 17 to him to hold for us. 18 Q And was he -- was his -- and I know that's 19 what he was telling you, but was he telling you that 20 his intent was to buy a house for you to live in? Or 21 to perform more commercial sex acts? 22 A Probably both. 23 Q Was there ever a time that PD stated that 24 his intention was to be in any kind of relationship 25 with you?</p>

<p style="text-align: right;">Page 74</p> <p>1 A To my knowledge, I wouldn't say 2 relationship. But definitely at one point he started 3 speaking, like, romantically with me. Like, I don't 4 remember his exact words. But I remember him it 5 became a romantic thing. He told me after I turned 6 18. Like, we could be together or something maybe. 7 Q Okay. All right. I'm going to hand you 8 what I'm marking as Defendant's Exhibit 8, which is 9 Plaintiff 12454.</p> <p>10 (Defendant Exhibit 8 was marked for 11 identification.)</p> <p>12 And these are text messages from June 23rd 13 of 2017. So we've talked about, you know, that night 14 of June 22nd that you were on Fulton Industrial. 15 Right?</p> <p>16 A Yes. Correct.</p> <p>17 Q So I want to just go through a few of these 18 messages. At the top, and this is June 23, 2017, 19 11:26 UTC. So that's 6:26 a.m. Eastern Time on June 20 23rd. You say, "It's almost 8:00 a.m. and we haven't 21 been to sleep. We just finished walking the streets 22 and I feel like I was in The Purge." You sent that to 23 Payton. Correct?</p> <p>24 A Yes.</p> <p>25 Q And then Payton asks you a question. Says,</p>	<p style="text-align: right;">Page 76</p> <p>1 A I don't know if that's his trafficking 2 associate or what they were. He would pay for the 3 hotel rooms.</p> <p>4 Q Okay. So you -- the -- when y'all -- on 5 June 22nd, the day before, a female that you don't 6 know, picked you up and paid for the hotel room?</p> <p>7 A Correct.</p> <p>8 Q Okay. Now we're to June 23rd, and I know 9 that we're in the morning right now. So you probably 10 haven't checked into a hotel room. But do you 11 remember if you did check into a hotel room on June 12 23rd?</p> <p>13 A Yes. That's -- he went and picked up Doc. 14 And Doc went and checked us in at the United Inn and 15 Suites that day.</p> <p>16 Q And that was on June 23rd?</p> <p>17 A Correct.</p> <p>18 Q Tell me what you remember about June 23rd. 19 When did you check into the United Inn?</p> <p>20 A I remember when we went and picked up Doc. 21 I remember PD left us in the car for a long time. Me 22 and Alyssa almost fell asleep. I remember we 23 drove -- I just remember driving around Atlanta for a 24 long time that day. I don't know where we went. 25 But then we went to the hotel. And Doc went</p>
<p style="text-align: right;">Page 75</p> <p>1 "Did you get to dance or anything?" And you respond, 2 "No. We literally are the worst hookers ever. We 3 didn't know WTAF to do. But he picked us up and we in 4 the pretty part of ATL now." End of message.</p> <p>5 So that message was at 6:36 a.m. Eastern 6 Time on June 23rd. I want to ask you a few questions 7 about. So you've told me that at this point, you 8 thought you were going up there to strip. Is there a 9 difference to you in using the term stripper and 10 hooker?</p> <p>11 A Yes.</p> <p>12 Q Okay. Is it fair to say that at this time 13 on June 23rd at 6:36 a.m. you became aware that it was 14 the Obies' intent that y'all be hookers?</p> <p>15 A Correct.</p> <p>16 Q Okay. Who -- you say he picked us up. Who 17 is he?</p> <p>18 A PD.</p> <p>19 Q And do you know what you meant by the pretty 20 part of ATL?</p> <p>21 A We had went and picked Doc up from 22 somewhere, his associate.</p> <p>23 Q Do you know what Doc's name is?</p> <p>24 A Dontavious Carr, I think.</p> <p>25 Q And is that just a friend of PD's?</p>	<p style="text-align: right;">Page 77</p> <p>1 in and paid for the room. And PD stood outside of the 2 car till he came back. And then he woke us up and 3 told us to get our stuff.</p> <p>4 And for some reason I feel like that day he 5 sat in the room with us for a while and talked to us 6 that morning. I'm not necessarily sure what he said, 7 but I know that day me and Alyssa got dressed. And I 8 know when we first left out of our hotel immediately 9 with whatever we had on, we had on like, cropped bras 10 and bootie shorts and thigh high heel boots.</p> <p>11 And there was a black woman who stopped us 12 and tried to give us her card. And it was, like, I 13 don't know what the card said, but she basically told 14 us that we needed to get help. And we didn't need to 15 be out here doing whatever we were doing.</p> <p>16 We walked up and down Memorial for hours 17 that day. We didn't meet anybody until probably about 18 two. Now we walked from probably checking in 19 till -- we didn't meet anybody till about 2:00, 3:00 20 a.m. We met these two Haitian men. And they came to 21 our room and paid for sex. And they left.</p> <p>22 And we met one more man that night which was 23 like a older man who was driving through the parking 24 lot real slow. And he rolled the window down and 25 asked us what we were doing. And we asked him what he</p>

<p style="text-align: right;">Page 78</p> <p>1 was looking for. And he came and had commercial sex 2 with us.</p> <p>3 Q When y'all got to the United Inn and Suites 4 on June 23rd, when you all pulled in, is PD driving or 5 is Doc driving?</p> <p>6 A PD is driving.</p> <p>7 Q And you said Doc gets out. He goes to the 8 lobby to check in?</p> <p>9 A Yes. Correct.</p> <p>10 Q And y'all were asleep in the car at this 11 point?</p> <p>12 A We were asleep on the way. But, like, when 13 we pulled up into the hotel parking lot, we woke up.</p> <p>14 Q And are you familiar with the United Inn in 15 the sense that there's two parking lots?</p> <p>16 A A front and a back parking lot.</p> <p>17 Q Right. Did PD pull into the front parking 18 lot or the back?</p> <p>19 A The front parking lot.</p> <p>20 Q Do you remember what room you stayed in that 21 night?</p> <p>22 A 112.</p> <p>23 Q And how do you remember that?</p> <p>24 A Because I saw the check-in information for 25 Doc, the room he booked.</p>	<p style="text-align: right;">Page 80</p> <p>1 Q Do you remember any conversations that Doc 2 had with you? If that was the time that he stayed in 3 the room and sat with you all?</p> <p>4 A Can you repeat that one more time?</p> <p>5 Q Yes, ma'am. You'd said that you believe 6 that -- you weren't positive, but you thought that 7 that might have been the day that Doc stayed in the 8 room with y'all for a little while?</p> <p>9 A PD. I think he stayed in the room with us 10 for a little bit.</p> <p>11 Q Okay. And any -- do you recall y'all's 12 conversations at all?</p> <p>13 A So every morning he would come in our room 14 and -- I -- I just think he would talk to us about how 15 we had to meet -- maybe that was the day he explained 16 that we had a \$500 quota every day.</p> <p>17 And I think me and Alyssa finally asked him, 18 like, do we have to have sex for the money. And he 19 told us yes.</p> <p>20 Q And what happened when he said yes?</p> <p>21 A I would say, like, at that point me and 22 Alyssa start -- we switched to, like, a survival type 23 of thing. Like, well, we're here. We're ashamed for 24 what we did last night. Everybody already thinks 25 we're nasty in a way. So we just, like, survived in</p>
<p style="text-align: right;">Page 79</p> <p>1 Q Was it like a printout receipt you get?</p> <p>2 A Yes.</p> <p>3 Q Okay. And explain to me how did you get 4 from the car that PD was driving to Room 112?</p> <p>5 A We walked inside. We got our luggage out 6 and walked inside.</p> <p>7 Q Walked inside the room?</p> <p>8 A Yes.</p> <p>9 Q And, you know, the United Inn and Suites, 10 that the check-in lobby is to the far, lefthand 11 corner?</p> <p>12 A Correct.</p> <p>13 Q Where is Room 112 in relation to that?</p> <p>14 A If the lobby is over here, the 112 is to the 15 far left on the first row.</p> <p>16 Q Is the entrance from the front parking lot?</p> <p>17 A Yes. To the room?</p> <p>18 Q Yes, ma'am.</p> <p>19 A Correct.</p> <p>20 Q What were you wearing when you walked into 21 the hotel? I know that you are dressed up when you 22 left, but what were you in walking in?</p> <p>23 A I had some blue jeans, those same black, 24 leather thigh high boots, and like a cropped top, lace 25 shirt.</p>	<p style="text-align: right;">Page 81</p> <p>1 that moment. We just decided to do what we had to do.</p> <p>2 Q And then you and A.G. got dressed, and you 3 walked out at this point. Is this just late afternoon 4 roughly?</p> <p>5 A I would say maybe 1:00 or 2:00 p.m. More so 6 mid-day.</p> <p>7 Q And I think you said you walked out of there 8 as a black woman that tried to give you a card saying 9 you don't need to do this. Is that correct?</p> <p>10 A Yes. Like, maybe she was from a church or 11 something. She was trying to tell us to call our 12 parents, and that we didn't need to be out here like 13 that.</p> <p>14 Q Was she in the parking lot of United Inn?</p> <p>15 A Mm-hmm.</p> <p>16 THE REPORTER: Is that a yes?</p> <p>17 THE WITNESS: Yes, ma'am.</p> <p>18 BY MR. STORY:</p> <p>19 Q What did y'all say back to her?</p> <p>20 A I think we just took her card and kept 21 walking. And told her we were fine, I think.</p> <p>22 Q Did you ever call that lady?</p> <p>23 A No.</p> <p>24 Q And then you said y'all just walked Memorial 25 Drive?</p>

<p style="text-align: right;">Page 82</p> <p>1 A Correct. 2 Q But didn't meet anyone until 2:00 to 3:00 3 a.m.? 4 A Correct. 5 Q All right. So that would take us ultimately 6 to June 24th. So from that time that you arrive at 7 the United Inn with Doc and PD in the car, just June 8 23rd specifically. You know, it ends at midnight. 9 There was no sex trafficking that occurred on June 23, 10 2017, at the United Inn and Suites. Is that correct? 11 With you specifically? 12 A Correct. 13 MR. BOUCHARD: I'm going to object to 14 form on that question. 15 MR. STORY: Madam Court Reporter, I 16 have lost my place on exhibits. What number am I on? 17 THE REPORTER: One moment, please, sir. 18 We are going to be on Exhibit 9. 19 MR. STORY: Thank you. 20 THE REPORTER: Yes, sir. 21 BY MR. STORY: 22 Q I'm going to hand you what I'm marking as 23 Defendant's Exhibit 9. 24 (Defendant Exhibit 9 was marked for 25 identification.)</p>	<p style="text-align: right;">Page 84</p> <p>1 A At the time. Yes. 2 Q Okay. No longer? 3 A No. 4 Q All right. I'm going to hand you what I'm 5 marking as Plaintiff's [sic] Exhibit 10 which is 6 Plaintiff 012444. 7 (Defendant Exhibit 10 was marked for 8 identification.) 9 THE REPORTER: And, Counsel, you said 10 Plaintiff's Exhibit 10. Did you mean -- 11 MR. STORY: I meant Defendant's Exhibit 12 10. Thank you, Madam Court Reporter. If you can keep 13 correcting my errors I would greatly appreciate it. 14 Keeping a clean record. I do appreciate it. 15 BY MR. STORY: 16 Q Now, Ms. G.W., these are text messages 17 against from June 24th of 2017. I want to bring your 18 attention to the top half of this document where it 19 says June 24, 2017, 19:41 UTC. So that's 14:41. So 20 that's 2:41 p.m. on June 24th. 21 And it says -- it's a message from you to 22 Madison Waldrop. "No where still out here and it's a 23 lot better. Our boss makes us feel safe and the more 24 we meet with him the more we realize that he's got us 25 and that he really is going to make us rich." End of</p>
<p style="text-align: right;">Page 83</p> <p>1 It's Plaintiff 012449. It's text messages 2 from June 24, 2017, which we'll see in a second is 3 actually somewhere from the night of June 23rd. I 4 want to bring your attention to the bottom, Ms. G.W., 5 and see 6/24/17 at 3:32 UTC. It starts with "I hope 6 y'all." 7 A Mm-hmm. 8 Q I'm going to read this out loud for the 9 record. This is June 24, 2017, from Ms. G.W. to 10 Payton, and it's 3:32 UTC, which actually means it was 11 sent on June 23, 2017, at 10:32 p.m. Eastern. 12 It states, "I hope y'all know Alyssa is lazy 13 AF. She literally is too lazy to fuck for money and 14 that's sad AF. Just tell Buck she ain't gonna make 15 him no type of moneys." End of message. 16 Who is Buck, Ms. G.W.? 17 A Alyssa's baby daddy. 18 Q Did he know that she was doing this? 19 A When we got back, we -- we figured that 20 Payton was once a prostitute or whatever. And that 21 she already knew what she was sending us to. So we 22 assumed that she had told Buck everything or whatever. 23 Q Okay. And you've told me this, but just to 24 keep it clear in my head. Payton is Buck's 25 girlfriend?</p>	<p style="text-align: right;">Page 85</p> <p>1 message. 2 Ms. G.W., when you say our boss, are you 3 referring to PD? 4 A Correct. 5 Q And tell me, what was he doing at that time 6 to make y'all feel safe and that he was going to make 7 y'all rich? 8 A He was grooming us, telling us how, like, 9 we're amazing and every little dollar we bring him, he 10 gives us encouragement. He's telling us that he's 11 watching us. He's constantly monitoring us to try to 12 make us feel safe to leave out of the hotel and meet 13 people. Or if there's people in our room, he's making 14 us feel like he's watching our room. 15 Q All right. So we're at where you all were 16 walking Memorial. And then we got to midnight of June 17 24th. You said you didn't meet anyone till about 2:00 18 or 3:00 a.m. Is that correct? 19 A Correct. 20 Q And the first group you met were two Haitian 21 men? 22 A Correct. 23 Q Where did you meet them? 24 A At a gas station further up the street. 25 Q Do you remember what the gas station was</p>

<p style="text-align: right;">Page 86</p> <p>1 called?</p> <p>2 A No. But it was in the righthand side of</p> <p>3 Memorial, same side of the road that United Inn was</p> <p>4 on.</p> <p>5 Q And how -- I mean, how did that conversation</p> <p>6 go? Who approaches who?</p> <p>7 A To my knowledge, I think we approached them.</p> <p>8 We used to be pretty direct, like, I'm assuming we</p> <p>9 either said what you looking for, or you looking to</p> <p>10 pay for some pussy. One or the other.</p> <p>11 Q And did they -- did you ride with them back</p> <p>12 to the United Inn?</p> <p>13 A No. Because they wanted us to come to their</p> <p>14 house, and we told them we had to stay at our hotel.</p> <p>15 So they had met us down at our hotel. We walked back,</p> <p>16 and they drove there.</p> <p>17 Q Okay. But ultimately did they come into</p> <p>18 Room 112?</p> <p>19 A Correct.</p> <p>20 Q And you know, it doesn't escape me, Ms.</p> <p>21 G.W., that I'm asking you about stuff that</p> <p>22 was -- occurred over five years ago. And a lot of</p> <p>23 times I'm going to ask you to give me an estimate.</p> <p>24 I'm not here to, you know, make you an exact</p> <p>25 historian. But roughly speaking, about how long do</p>	<p style="text-align: right;">Page 88</p> <p>1 A About two hours.</p> <p>2 Q How long was he in there?</p> <p>3 A Maybe 30 minutes.</p> <p>4 Q And then he paid y'all, and he left?</p> <p>5 A Correct.</p> <p>6 Q I think you said earlier that y'all</p> <p>7 were -- after the Haitian men had left that y'all were</p> <p>8 loitering in the United Inn's parking lot for about</p> <p>9 two hours. Tell me, if you can. Give me some more</p> <p>10 detail about what y'all were doing.</p> <p>11 A We could have maybe walked around the entire</p> <p>12 hotel. Like, just walking back and forth from the</p> <p>13 front to the back. Or we stood, like -- like, there's</p> <p>14 a middle part of -- I'm thinking back to the hotel</p> <p>15 like a breezeway. I think we stood in the breezeway.</p> <p>16 Q Do you remember -- again we're in the early</p> <p>17 morning hours of June 24th. Do you remember seeing</p> <p>18 any employees of United Inn at that time?</p> <p>19 A No. No employees at that time. But we saw</p> <p>20 employees like the day before, like that Friday.</p> <p>21 Q Tell me about that when y'all saw employees</p> <p>22 on June 23rd.</p> <p>23 A Like employees pushing their carts, the</p> <p>24 cleaning service. We saw them. I don't think we</p> <p>25 interacted with them until Saturday because we needed</p>
<p style="text-align: right;">Page 87</p> <p>1 you think those two Haitian men were in your room?</p> <p>2 A Maybe 30 minutes.</p> <p>3 Q And did you and A.G. have sexual intercourse</p> <p>4 with them?</p> <p>5 A Correct.</p> <p>6 Q Do you remember how much they paid?</p> <p>7 A No. Maybe \$60 to \$100.</p> <p>8 Q And then after it was done, did they just</p> <p>9 leave the hotel room?</p> <p>10 A Correct.</p> <p>11 Q And then what do y'all do from there? Do</p> <p>12 you all stay in the room? Do y'all go to the parking</p> <p>13 lot? Do y'all go walk the street?</p> <p>14 A We probably went back out. No. I would say</p> <p>15 since that was about two or three, we loitered in the</p> <p>16 parking lot for about two hours.</p> <p>17 And that's when the man in the construction</p> <p>18 gear came right in through the parking lot with his</p> <p>19 window down. And he asked us -- or we asked him what</p> <p>20 he was looking for. And he came into our hotel room</p> <p>21 with us.</p> <p>22 Q And it was just one man?</p> <p>23 A Yes. Correct.</p> <p>24 Q Okay. You said it was probably a few hours</p> <p>25 after the Haitian men?</p>	<p style="text-align: right;">Page 89</p> <p>1 more towels on Saturday and more -- we had asked if</p> <p>2 they had tampons. I remember that.</p> <p>3 Q And so on Saturday, June 24th?</p> <p>4 A Well, not tampons. I can remember that we</p> <p>5 asked -- we had asked for something. Maybe like</p> <p>6 deodorant. I think it was deodorant.</p> <p>7 Yes. July 24th is when that would have</p> <p>8 happened. Or June 24th.</p> <p>9 Q So you asked for towels and deodorant?</p> <p>10 A Yes. Correct.</p> <p>11 Q And they've got like a little store almost</p> <p>12 behind the desk where you can buy certain items?</p> <p>13 A Yes. We've been -- we went in there. We</p> <p>14 bought chips, noodles, condoms, stuff like that, out</p> <p>15 the front desk area.</p> <p>16 Q On June 24th specifically, that Saturday,</p> <p>17 y'all just spent y'all's first night at the United</p> <p>18 Inn. Did you -- do you know if you bought condoms</p> <p>19 from the front desk on June 24th?</p> <p>20 A The 25th. It would have been that Sunday we</p> <p>21 would have bought some.</p> <p>22 Q Okay. Did -- when y'all asked for towels on</p> <p>23 the 24th, did they provide you with towels?</p> <p>24 A Mm-hmm.</p> <p style="text-align: right;">THE REPORTER: Is that a yes?</p>

<p style="text-align: right;">Page 90</p> <p>1 THE WITNESS: Yes.</p> <p>2 BY MR. STORY:</p> <p>3 Q And what about -- did you have to pay for</p> <p>4 deodorant?</p> <p>5 A I don't think they had deodorant. I don't</p> <p>6 think -- like, when we asked the clerk lady, I don't</p> <p>7 think they had any on them.</p> <p>8 Q Okay. And explain to me what the -- do you</p> <p>9 know the clerk lady's name?</p> <p>10 A No.</p> <p>11 Q What did she look like?</p> <p>12 A A Hispanic maybe woman. Or like a lighter</p> <p>13 tone, fairer tone woman.</p> <p>14 Q All right. So after the construction guy</p> <p>15 drives in -- speaking of when he drives in, is he</p> <p>16 driving slowly in the front parking lot or the back</p> <p>17 parking lot?</p> <p>18 A Front parking lot.</p> <p>19 Q All right. So that -- I mean, roughly</p> <p>20 speaking, gets us to, like, seven or eight o'clock in</p> <p>21 the morning. And we're still on June 24th. Did you</p> <p>22 go to sleep at this point?</p> <p>23 A We never slept. We maybe got, like, a nap.</p> <p>24 Like an hour or two. But we never slept more than</p> <p>25 three hours. So maybe we took a nap that day. He</p>	<p style="text-align: right;">Page 92</p> <p>1 Q And generally speaking, when he would come</p> <p>2 get y'all's money?</p> <p>3 A Probably right before check-in. Probably</p> <p>4 after 9:00 a.m.</p> <p>5 Q All right. So we get to check-in time on</p> <p>6 June 24th. And I know y'all stayed in Room 112 on the</p> <p>7 night of the 23rd. Did y'all switch hotel rooms for</p> <p>8 the 24th?</p> <p>9 A No. We were in the same room the whole</p> <p>10 time.</p> <p>11 Q Had you -- at this point on the 24th, had</p> <p>12 you seen Doc again?</p> <p>13 A No. We didn't.</p> <p>14 Q And so from -- that 24th is Saturday. Do</p> <p>15 you recall if you primarily walked the streets, did</p> <p>16 Backpage?</p> <p>17 A So I would say, like, Saturday when he came</p> <p>18 back to collect the money, that's when he told us to</p> <p>19 make Plenty of Fish profiles. We tried setting it up,</p> <p>20 but we couldn't figure it out. So we just left that</p> <p>21 alone.</p> <p>22 I know we had to have walked around that day</p> <p>23 also because at one point that day, we had met this</p> <p>24 boy who was driving, and he ended up bringing five men</p> <p>25 back to our hotel room.</p>
<p style="text-align: right;">Page 91</p> <p>1 didn't want us to sleep.</p> <p>2 So maybe we went to sleep around -- he -- I</p> <p>3 know, like, he had a thing where he wanted us to work</p> <p>4 till, like, 10:00 a.m., 11:00 a.m. And then maybe we</p> <p>5 can nap from, like, 11:00 to, like, 2:00. That was,</p> <p>6 like, our napping time.</p> <p>7 Q Were y'all being monitored by any -- by</p> <p>8 either PD or any of his associates?</p> <p>9 A He had us under the impression that he was</p> <p>10 constantly monitoring us, that he was, like,</p> <p>11 constantly driving up and down Memorial watching us.</p> <p>12 And from the way he would, like, disappear</p> <p>13 in the morning for 20 minutes, like, I -- I don't know</p> <p>14 necessarily if he was in, like, friends with the front</p> <p>15 desk or friends with the people who worked at the</p> <p>16 hotel, and asked them to monitor us. But I just know</p> <p>17 that he told us he was monitoring us.</p> <p>18 Q And what do you mean he'd disappear for 15</p> <p>19 or 20 minutes?</p> <p>20 A When he would come get our money, he would,</p> <p>21 like -- he never told us I'm going to go pay for</p> <p>22 another room. I had to get older to realize that's</p> <p>23 what he was doing. But he would leave out the room</p> <p>24 for, like, 15 to 20 minutes, sometimes maybe 30</p> <p>25 minutes. And then come back.</p>	<p style="text-align: right;">Page 93</p> <p>1 Q He ended up bringing how many men? I'm</p> <p>2 sorry.</p> <p>3 A Five.</p> <p>4 Q And I cut you off. What were you going to</p> <p>5 say?</p> <p>6 A And like these -- this encounter with these</p> <p>7 people, they were -- they had -- they just were doing</p> <p>8 a lot. I think they made me and Alyssa uncomfortable.</p> <p>9 They wanted more than just like -- they wanted to be</p> <p>10 there for a long time.</p> <p>11 So we tried to kick them out of our room.</p> <p>12 And they tried to -- I think one of them left their</p> <p>13 shoes in the room or something. So they were banging</p> <p>14 on the door, being really loud, screaming. And we</p> <p>15 didn't want to let them in. And so they were out</p> <p>16 there for a while yelling at us to let them back in.</p> <p>17 I had pepper spray back then. So I</p> <p>18 remember, like, telling them I was going to pepper</p> <p>19 spray them or something. And, like, they were just</p> <p>20 banging on the door asking, I guess, eventually for</p> <p>21 their shoes. So we gave them their shoes, and they</p> <p>22 left.</p> <p>23 And then those two Haitian men ended up</p> <p>24 coming back with about two to three more people with</p> <p>25 them, two to three more men with them. And I know at</p>

<p style="text-align: right;">Page 94</p> <p>1 this time with them, I was in the bathroom and Alyssa 2 was in the room. And there might have been two guys 3 in the bathroom with me.</p> <p>4 I remember Alyssa had got slapped by one of 5 them for some reason. So one of them had assaulted 6 her, and she was really upset about it. And I'm sure 7 we finished the job or whatever. But I just remember 8 with those group of men, one of them slapped Alyssa.</p> <p>9 Q So the boy you met driving on June 24th, was 10 he driving on Memorial?</p> <p>11 A Yes. Correct.</p> <p>12 Q So you met him when you all were walking 13 Memorial?</p> <p>14 A Correct.</p> <p>15 Q And he -- y'all had a conversation. And he 16 said I want to bring back my friends?</p> <p>17 A Yes. Correct. We told him, I guess, what 18 we were doing. And he was, like, well, I can help you 19 all out. And he brought back those five men. They 20 were supposed to pay us \$500, but the boy ended up 21 keeping, like, \$200 of it. Something like that. So 22 he got some money out of the deal.</p> <p>23 Q Okay. And did the entire -- the group of 24 five men all have sexual intercourse with you and 25 A.G.?</p>	<p style="text-align: right;">Page 96</p> <p>1 in the hotel bathroom with two of the men when you 2 believe that A.G. got slapped?</p> <p>3 A Correct.</p> <p>4 Q Did it end at that point?</p> <p>5 A I think they got, like, aggressive after 6 that happened. And I don't know how I ended up 7 getting them out the room somehow. But I made them 8 leave the room. Yeah.</p> <p>9 Q Okay. And so they left. Did you ever see 10 them again?</p> <p>11 A Nn-mm. No, sir.</p> <p>12 Q Okay. How long do you think that -- I'm 13 just going to call them the group of Haitian men. How 14 long do you think that group of Haitian men was in 15 Room 112?</p> <p>16 A I would say, like, 45 minutes.</p> <p>17 Q I'm going to hand you what I'm marking as 18 Defendant's Exhibit 11.</p> <p>19 (Defendant Exhibit 11 was marked for 20 identification.)</p> <p>21 This is Plaintiff 008090. And I'll 22 represent to you, Ms. G.W., do you see -- go down to 23 8416. Do you see that?</p> <p>24 A Yes.</p> <p>25 Q It says Sent and it says From. And it's got</p>
<p style="text-align: right;">Page 95</p> <p>1 A Yes. And the boy also. So six of them.</p> <p>2 Q What time was the sex occurring on June 3 24th?</p> <p>4 A It was dark outside, so maybe like after 5 7:00 p.m.</p> <p>6 Q And they're in there for 30 minutes, an 7 hour?</p> <p>8 A Thirty minutes.</p> <p>9 Q And about how long do you think they were 10 outside knocking on your door?</p> <p>11 A Probably about 15, 20 minutes.</p> <p>12 Q So then y'all give the shoes back, and they 13 leave? Is that correct?</p> <p>14 A Yes. They do.</p> <p>15 Q And then on that same night the Haitian men 16 returned?</p> <p>17 A Yes. They came knocking on our door.</p> <p>18 Q Okay. And they -- you said the two men had 19 two to three more men with them?</p> <p>20 A Mm-hmm. It was four to five of them.</p> <p>21 Q And did the same thing occur? That entire 22 group had sexual intercourse with you and A.G.?</p> <p>23 A Correct.</p> <p>24 Q And I think you said -- and I don't want to 25 tell you what you're saying if I'm wrong, but you were</p>	<p style="text-align: right;">Page 97</p> <p>1 that 404 number.</p> <p>2 A Mm-hmm.</p> <p>3 Q I'll represent to you that that's Obie's 4 phone, and he's texting Kikia Anderson. Okay?</p> <p>5 A Okay.</p> <p>6 Q And as you see, this is June 26, 2017. With 7 the time change, it's 6:15 a.m. Eastern Time. And I'm 8 going to read this message out loud.</p> <p>9 It says, "Not for long. I'm going to have 10 all 2 of my games dropped off and on Commerce, 11 Georgia, for about 2-3 days. So I'll be chilling at 12 my mama spot. Tuma Little People brand. Bring the 13 car back, but right now I'm on the way to Memorial 14 Drive." End of message.</p> <p>15 My question, Ms. G.W., is when he says two 16 of my games, is he referring to you and A.G.?</p> <p>17 A I'm not sure. I'm going to assume, but I'm 18 not sure.</p> <p>19 Q Do you know what Tuma Little People is?</p> <p>20 A No. I don't.</p> <p>21 Q Did you go back to Commerce, Georgia, for a 22 few days?</p> <p>23 A Yes. I did.</p> <p>24 Q Did PD take you?</p> <p>25 A No. The lady who dropped -- who picked us</p>

<p style="text-align: right;">Page 98</p> <p>1 up from Commerce, she took us home. 2 Q Okay. Did she take you home on June 26th? 3 A Correct. That Monday. 4 Q That Monday. 5 A Yes. 6 Q Okay. Going to that day prior to that 7 Sunday, I think you told me earlier that you believe 8 that you bought condoms from the United Inn and Suites 9 on June 25th? 10 A I would say that one is for a fact. I know 11 that one for a fact, but we did. I know we did. 12 Q Okay. Tell me how you know that. 13 A 'Cause I remember buying them. I remember 14 buying them from the front desk. 'Cause we 15 needed -- we had ran out of the ones we had. 16 Q What kind of condoms were they? 17 A Either Trojan or the Magnum. Either Trojan 18 or Magnum. 19 Q How did you pay for them? 20 A I think cash. 21 Q And who did you buy them from in the lobby 22 at United Inn? 23 A I think from the black lady that was working 24 there. 25 Q You don't remember her name. Do you?</p>	<p style="text-align: right;">Page 100</p> <p>1 door we went in or not let the, like, staff see us 2 pretty much. 3 Q When y'all bought those condoms on Sunday, 4 June 25th, did y'all buy anything else from the lobby? 5 A Now this could have been Saturday or Sunday. 6 I just want to note that, that we bought the condoms. 7 We bought chips and cup noodles, I'm pretty 8 sure. 9 Q And y'all are still in Room 112? 10 A Yes. 11 Q Do you remember, did you spend the night at 12 United Inn on that Sunday night, June 25th? 13 A Yes. We did. 14 Q So was it your understanding that 15 either -- 'cause Doc checked out the room the first 16 night for the 23rd. Right? 17 A Correct. 18 Q But then you didn't see Doc again. Right? 19 A Not until he -- him and Obie, or PD, picked 20 me up July 1st or 2nd and brought me back to the 21 United Inn. He was there that time also. 22 Q So do you know who was actually checking out 23 the rooms? The room 112 on the 24th and 25th? 24 A PD. He was paying for another night every 25 night.</p>
<p style="text-align: right;">Page 99</p> <p>1 A No. I don't. 2 Q Did you show her any kind of identification 3 to buy the condoms? 4 A No. I didn't. 5 Q Did she ask you any questions about what you 6 were buying the condoms for? 7 A No. She didn't. 8 Q Had you been instructed by PD on what to say 9 if you were asked what to say what the condoms were 10 for? 11 A I don't necessarily know about condoms. But 12 he definitely instructed us, like, how to not give 13 ourself away, or something like that. Like, not to be 14 telling anybody anything pretty much. 15 Q And so how -- what were, kind of, his 16 instructions for how to -- 17 A Like, he would instruct us not to leave 18 condoms in the trash can. Even though we did, but, 19 like, he would tell us not to. 20 He would instruct us not to be hanging in 21 the hallways, loitering in the parking lot, but we 22 still did. 'Cause we started finding clients that 23 way, so that's -- that became our new way of getting 24 them instead of walking up and down the street. 25 He would tell us to not let people see which</p>	<p style="text-align: right;">Page 101</p> <p>1 Q And would he just come back and tell you the 2 room's checked out? 3 A Like, we never would check out. We just 4 would pay for an additional day every day I'm 5 assuming. He didn't tell us any information or 6 nothing like that. This is all stuff I'm assuming 7 since I've gotten older. But I just -- he would 8 disappear for 15, 20 minutes. 9 He'd come, take the money, leave out the 10 room for 15, 20 minutes. Then come back and tell us 11 to get some more. 12 Q Do you know if he had, like, any fake IDs or 13 anything like that? 14 A Not to my knowledge. 15 Q The reason I ask, my client has searched 16 their records up and down and left and right. And 17 they cannot find one piece of evidence that Mr. Obie 18 ever checked a room out. And I hear what you're 19 saying. You're just telling me what you know. 20 But is it possible that -- I know y'all gave 21 PD the money. But that when he went out of the hotel 22 that he was giving the money to somebody else and they 23 were checking the room out for you? 24 A I don't think so because I saw the records 25 for the hotel room. And Doc, who his legal name was</p>

<p style="text-align: right;">Page 102</p> <p>1 like Dontavious Carr, his name was on the room for 2 those three days. Yeah.</p> <p>3 Q I got you. Okay. After y'all purchased 4 condoms -- and I know it could have been Saturday, the 5 24th, and might have been Sunday, the 25th -- do you 6 recall if you performed any commercial sex services on 7 Sunday, June 25, 2017?</p> <p>8 A Yes. I would say with at least two to three 9 people.</p> <p>10 Q And where did you find those people?</p> <p>11 A I can't necessarily remember two of them. 12 But I know I remember one man which was somebody we 13 also found in the hotel riding through looking for 14 some money. This time he was riding through the back 15 part and we met him.</p> <p>16 Q On this first weekend, the 23rd, 24th, and 17 25th, was there ever -- did any United Inn employee 18 ever initiate a conversation with you?</p> <p>19 A We had got locked out of our hotel room on 20 Saturday also. I forgot to mention that. And PD told 21 us to give the front desk person the phone or 22 something like that -- our phone -- and he spoke with 23 them, and they came and let us back in the room.</p> <p>24 Q And that was on Saturday?</p> <p>25 A Yes. Saturday or Sunday. I'm not sure</p>	<p style="text-align: right;">Page 104</p> <p>1 Q During this 23rd, fourth, and fifth, did 2 room service come in and clean y'all's room?</p> <p>3 A I think so. I'm pretty sure they did 'cause 4 that's why I said Obie, PD, would tell us to clean up 5 the condoms. Don't let them just be laying 6 everywhere.</p> <p>7 So I think at one point, maybe on that 8 Sunday, they came and cleaned the room. Well, maybe 9 not cleaned the room, but like, knocked on the door, 10 asked if we needed some service, and we asked for, 11 like, some more towels. Or returned our wet towels 12 and got new ones.</p> <p>13 Q All right. So June 26th is a Monday. And 14 best of your recollection, you returned to Commerce on 15 June 26th?</p> <p>16 A Yes. They came and got us about twelve 17 o'clock that day.</p> <p>18 Q Can you say that one more time? I'm sorry.</p> <p>19 A They came and got us about twelve o'clock 20 that day.</p> <p>21 Q And by they, do you mean PD and that female 22 that first picked you up in Commerce?</p> <p>23 A Well, just the female. PD wasn't there 24 the -- I don't know if -- I don't know. I just know 25 the lady came and picked -- took us home. Because he</p>
<p style="text-align: right;">Page 103</p> <p>1 which day particular.</p> <p>2 Q And so you handed your phone to the person 3 at the front desk, and PD talked to that person?</p> <p>4 A To my knowledge. I don't know if that's 5 exactly the way it went. But I know he -- he spoke 6 with the person at the front 'cause we had got locked 7 out and called him.</p> <p>8 I don't know if he called, like, the phone. 9 Or if we handed them the phone. But they came and let 10 us back in the room.</p> <p>11 Q And was it that same black female at the 12 front desk?</p> <p>13 A No. I think this one was, like, the Indian 14 man, the lighter tone man.</p> <p>15 Q So what did you tell them when you walked 16 into the lobby?</p> <p>17 A I don't think we told them anything. I 18 think we just gave him the phone, and he spoke with 19 him.</p> <p>20 Q And do you know anything that happened in 21 that conversation?</p> <p>22 A No. I just know they came and walked us to 23 the room and let us back in.</p> <p>24 Q That same Indian man?</p> <p>25 A Mm-hmm. Correct.</p>	<p style="text-align: right;">Page 105</p> <p>1 collected our money every single day. She -- we never 2 gave our money to her. So maybe he was in the car 3 with her. I'm not sure.</p> <p>4 Q Okay. Do you remember having any 5 conversations with her on the way back to Commerce 6 along the lines of what's going on? Is PD a pimp? Is 7 this what my life's going to be moving forward? I 8 mean, anything like that?</p> <p>9 A By the last day, me and Alyssa were, 10 like -- I remember us crying either the last day or 11 the day before because we wanted to go home. We had 12 to beg to go home. It's not like was, okay. Y'all 13 come for three, four days. We had to ask him, can we 14 at least go home and see our family or something like 15 that.</p> <p>16 And at this time, this now when we have an 17 emotional connection to him. He's now manipulating 18 us, using a lot of terminology to make us feel like 19 he's protecting us. And we also had this big burden 20 now of the shame for all the acts that we did.</p> <p>21 And also he has all of our money. We 22 collected \$1,300 that weekend. So we're thinking that 23 he's telling us he's holding onto this money for us to 24 move into a house. Me and Alyssa were only looking 25 to, like, I guess, elevate our life in a way.</p>

27 (Pages 102 - 105)

<p style="text-align: right;">Page 110</p> <p>1 Q Okay. Do you have a distinct memory of 2 being walked back to your room by a United Inn 3 employee?</p> <p>4 A Not a distinct memory. I had a memory of 5 them walking us to the room and not just handing us 6 the key. But they could have just given us the key.</p> <p>7 Q Okay. And in that memory, is it still -- do 8 you still remember the United Inn employee as an 9 Indian man?</p> <p>10 A I remember dealing within a fairer tone man 11 at the -- but it could have been a woman. I'm not 12 sure in particular.</p> <p>13 Q Okay. So where we have left off, we were at 14 June 26th which is a Monday. And I believe you had 15 told me that they picked you up at about 12:00 p.m. to 16 return to Commerce?</p> <p>17 A Correct.</p> <p>18 Q So on June 27, 2017, that Tuesday, you would 19 have been in Commerce that whole day?</p> <p>20 A Correct.</p> <p>21 Q So is it accurate to say that you were not 22 physically present at the United Inn and Suites on 23 June 27, 2017?</p> <p>24 A Correct.</p> <p>25 Q The next day is June 28, 2017. That's a</p>	<p style="text-align: right;">Page 112</p> <p>1 Q Okay. So that takes us to July 1st which is 2 a Saturday of 2017. Were you still in Commerce on 3 July 1st?</p> <p>4 A I'm not sure about that.</p> <p>5 Q Okay. I'm going to hand you what I'm 6 marking as Defendant's Exhibit 13.</p> <p>7 (Defendant Exhibit 13 was marked for 8 identification.)</p> <p>9 It's Bates stamped Plaintiff 012384. These 10 are text messages from your phone on July 1, 2017. 11 Towards that middle, you see that 7/1/2017 from Payton 12 saying "Where you at G.W.?"</p> <p>13 A Yes.</p> <p>14 Q Then you text her back on July 1, 2017, 15 which would be at 10:35 a.m. Eastern Time and say, 16 "The house."</p> <p>17 A Okay.</p> <p>18 Q Does that refresh your recollection of where 19 you would have been on July 1st?</p> <p>20 A Yes. It did.</p> <p>21 Q And where would you have been?</p> <p>22 A In Commerce, Georgia.</p> <p>23 Q Okay. So is it accurate to say that you 24 were not physically present at the United Inn and 25 Suites on July 1, 2017?</p>
<p style="text-align: right;">Page 111</p> <p>1 Wednesday. Were you still in Commerce?</p> <p>2 A Correct.</p> <p>3 Q So is it accurate to say that on June 28, 4 2017, you were not physical present at the United Inn 5 and Suites?</p> <p>6 A Correct.</p> <p>7 Q On June 29, 2017. That's a Thursday. Were 8 you still in Commerce?</p> <p>9 A Correct.</p> <p>10 Q So it is accurate to say that on June 29, 11 2017, you were not physically present at the United 12 Inn and Suites?</p> <p>13 A Correct.</p> <p>14 Q June 30, 2017. That's a Friday. Were you 15 still at home in Commerce?</p> <p>16 A Correct.</p> <p>17 Q Is it accurate to say that on June 30, 2017, 18 you were not physically present at the United Inn and 19 Suites?</p> <p>20 A Correct.</p> <p>21 Q Who -- so I saw some texts from your mom 22 during that time that you were at home talking about 23 Ryan is still here. Come get him now. Who is Ryan?</p> <p>24 A A old friend of mine, high school friend.</p> <p>25 He was my little brother's friend.</p>	<p style="text-align: right;">Page 113</p> <p>1 A Correct.</p> <p>2 Q I'm going to hand you what I've marked as 3 Defendant's Exhibit 14 which is Plaintiff Bates 4 stamped 12373.</p> <p>5 (Defendant Exhibit 14 was marked for 6 identification.)</p> <p>7 These are text messages from your phone on 8 July 2, 2017, which was a Sunday. See this right in 9 the middle, and I'll read it out loud. It's a text 10 message from you to your mom.</p> <p>11 "Mom, please make sure I'm up at like 6:30, 12 7:00 because I'm leaving early in the morning and I 13 need you to take me by Alyssa's so I can get my bag 14 'cause Mac's getting us at like 9:00. But she said 15 she was going to call me when she heads there at 7:00. 16 That's why I need to be up. I came home tonight so I 17 can see you in the morning before I go." End of 18 message.</p> <p>19 Who is Mac?</p> <p>20 A I think that's -- I'm talking about Alyssa's 21 friend, Makelah, who stayed in Gwinnett County. And 22 I'm pretty sure I had told my mom that that's where I 23 was. I think that's what I was telling her.</p> <p>24 Q Okay. And this would have been, like, at 25 2:00 a.m. on July 2nd, Eastern. So that's the early</p>

<p style="text-align: right;">Page 114</p> <p>1 morning hours of Sunday. Do you believe -- did you go 2 back to Atlanta on Sunday?</p> <p>3 A Yes. I did.</p> <p>4 Q And you did not -- did A.G. come back with 5 you?</p> <p>6 A No. She didn't.</p> <p>7 Q Why did she not come back?</p> <p>8 A From my memory, I remember her convincing me 9 that she was supposed to come back with me. And her 10 ending up never showing up. She had went and stayed 11 the night with her mom that night. And I was at her 12 house. And I was, from what I remember, under the 13 impression that she was going to show up that morning.</p> <p>14 Q And who took you to Atlanta on Sunday?</p> <p>15 A PD and Doc came and picked me up from 16 Alyssa's house in Commerce.</p> <p>17 Q And who is Petey?</p> <p>18 A Zaccheus Obie.</p> <p>19 Q Oh. PD. Sorry.</p> <p>20 A Sorry.</p> <p>21 Q All right. So they come pick you up from 22 A.G.'s mom's house?</p> <p>23 A Correct.</p> <p>24 Q And where do you all go from there?</p> <p>25 A We go straight to the United Inn and Suites.</p>	<p style="text-align: right;">Page 116</p> <p>1 got -- she was like a victim of rape when she was 2 seven. And she was scared of the man, Doc. He stayed 3 in her neighborhood. And they left. And so now I'm 4 here with these other two girls.</p> <p>5 The Destiny girl, I thought she was way 6 older. She seemed to have known everything, like how 7 to get dates or clients. Me and Shay went walking 8 that day. Shay was very social. She socialized in 9 the hotel a lot.</p> <p>10 She -- we met another prostitute that day 11 who was also -- well, she was a prostitute, and she 12 was prostituting out of the United Inn. She had her 13 own room. Me and Shay ended up making or having a 14 client come to her room because Destiny was in our 15 room with her own clients.</p> <p>16 That night we had met a pimp that stayed in 17 the hotel. He tried to offer us cocaine that night. 18 He had came into our room which was originally the 19 room that PD had got us.</p> <p>20 I know we met another -- that was the night 21 we had met the man, Kodak. I'm pretty sure he was 22 staying at the hotel as well. I know we met him in 23 the parking lot of the hotel.</p> <p>24 We saw these other two girls. Well, 25 I'll -- I'll go -- well, yeah. 'Cause this is this</p>
<p style="text-align: right;">Page 115</p> <p>1 Q Okay. So on the night of July 2nd, which is 2 a Sunday, you stayed at the United Inn and Suites?</p> <p>3 A Yes. Correct. I got there midday. Or they 4 came and got me earlier that morning. And I had got 5 there in the daytime.</p> <p>6 Q Okay. And walk me through when y'all get 7 there and the check-in process.</p> <p>8 A So I think they already had the room. 9 Pretty sure they already had that room. When I 10 arrived, there was two underage girls being sex 11 trafficked in the room already. Well, only one of 12 them 'cause Shay was 18. But the Destiny girl, the 13 FBI ended up telling me she was only 15.</p> <p>14 I think I remember crying on the way up 15 there 'cause I was really sad Alyssa didn't come. I 16 was scared. I didn't want to go back especially not 17 by myself. And PD had tried to convince me that he 18 had somebody else there waiting on me. So that was 19 when I met Shay.</p> <p>20 I went -- he helped me bring my stuff up in 21 the room. Or I don't know if he helped me bring my 22 stuff in the room. I know I got my stuff in the room. 23 I'm not sure if he came in the room that day or not.</p> <p>24 But I remember talking with the girl, Shay.</p> <p>25 And she just was letting me know that she had</p>	<p style="text-align: right;">Page 117</p> <p>1 time. We saw these other two women that were older. 2 It was a black woman and a black -- a white woman and 3 a black woman who were also from my understanding 4 prostituting. They looked like they were. They had 5 on very short, revealing clothing with heels. And 6 they were also walking around the hotel.</p> <p>7 At this point this is -- I think Destiny 8 took pictures of me for the Backpage. I think she was 9 the one who did it maybe. And also at this point 10 where I'm starting to figure out how to use Plenty of 11 Fish. So I'm -- I don't know if they're sending 12 people to the room or if I'm trying to invite people 13 to the room off POF.</p> <p>14 Q And I'm going to ask you something about 15 that. Before I get too far ahead of myself, I want to 16 go back really quick to the June 23rd through the 25th 17 at the United Inn. Were you wearing the same outfit 18 that whole weekend?</p> <p>19 A No. I had black and white crop top or a 20 shirt that I had tied up and unbuttoned so that my 21 breasts would show. And like a little bootie skirt. 22 And then I also had on these very short black and 23 white, like, compression shorts. And I don't know 24 what shirt.</p> <p>25 Q Do you remember what shoes?</p>

<p style="text-align: right;">Page 122</p> <p>1 y'all got maid service? 2 A No. We didn't. 3 Q And why not? 4 A I don't know if they came every day. If 5 that is what they did, then they would have came. We 6 never stopped them, but I don't -- to my memory I 7 don't remember. 8 Q Would either PD or Doc or someone working 9 for PD -- would they come every morning right before 10 check-in to collect money? 11 A Yes. They would. 12 Q Okay. So y'all stayed there night of July 13 2nd? Somebody would have been there on the morning of 14 July 3rd to collect money? 15 A PD came. 16 Q And you said on the way back on July 2nd 17 from Commerce that you were crying in the car. And PD 18 was telling you something along the lines of, you 19 know, "Don't worry. I've got another girl for you." 20 Did you ever ask anything of like where is 21 the money that I've made? Anything like that? 22 A No. I didn't ask. But I didn't necessarily 23 have to ask. He would -- more so he would tell us, 24 like -- he'd like, "Just one more week and y'all are 25 going to be moving into y'all's house." "Two more</p>	<p style="text-align: right;">Page 124</p> <p>1 A Correct. I did. 2 Q Okay. I mean, I've got to say I'm very 3 impressed by your memory. How do you -- I get it. 4 It's July 4th. But how do you sit here and 5 remember -- 6 A I have went through the photos in my phone. 7 And I know I remember being at another hotel on the 8 4th of July. 9 Q Okay. What hotel were you at on the 4th of 10 July of 2017? 11 A It could have been the Travelodge or it 12 could have been the hotel, like, on Forest Park or 13 Jonesboro. Something like that. 14 Q And at this point would you have been moved 15 with Shay? 16 A Yes. So, like, the day that we left, I 17 think that was July 4th was the day. We went 18 to -- that was the first time we went to his mom's 19 house. And the Destiny girl left that day because she 20 was too young or something like that. 21 So they had took us to their mom's house and 22 took Destiny somewhere and came back without her. 23 Q And is this PD's mom? 24 A Correct. 25 Q I've seen her name in places that I</p>
<p style="text-align: right;">Page 123</p> <p>1 weeks and y'all" -- like he would always be, like, 2 making it seem like it was our purpose to the money 3 going to him. 4 Q I'm handing you what I'm marking as 5 Defendant's Exhibit 15. 6 (Defendant Exhibit 15 was marked for 7 identification.) 8 It's Bates stamped Plaintiff 012363. These 9 are text messages from July 3rd and July 4th of 2017. 10 And I want to take you, Ms. G.W., to the top of this 11 page. It says July 4, 2017. It's going to be 5:32 12 a.m. Eastern. It's a text from you to Payton. 13 It says, "Miss y'all but I'll FT you when I 14 get to my new room tomorrow. A bitch done moved to 15 stage 2." End of message. 16 So is FT Facetime? 17 A Yes. 18 Q Tell me what you meant by this text 19 message. 20 A I'm thinking back. I think I meant he moved 21 us to another hotel that day. So I'm assuming he made 22 it seem like he was moving us, like, as a reward. So 23 that's what I think I meant by that. 24 Q Okay. And you had told me previously you 25 believed that you checked out on the 4th.</p>	<p style="text-align: right;">Page 125</p> <p>1 can't -- Moody is it? Miss Moody maybe? 2 A Miss Moody. Yes. 3 Q Was this the first time you met Miss Moody? 4 A Correct. 5 Q Did you stay at her house the night of July 6 4th? Or you went to a hotel? 7 A So now that I'm older, I realize that they 8 would take us over there before check-in time. So 9 that's why we would be over there for, like, two, 10 three hours. That we had checked out the hotel and be 11 over there until it was time to check into another. 12 Q Okay. Who -- on the 4th who took you from 13 United Inn to PD's mom's house? 14 A I think this is the day we met Kiki. I'm 15 pretty sure she was with PD when he picked us up that 16 day. 17 Q Okay. And then do you remember who took you 18 from PD's mom's house to whatever hotel you stayed at 19 that night? 20 A No. I don't remember. 21 Q Going back to the July 2nd and 3rd time 22 frame, did you ever walk into the lobby of the United 23 Inn? 24 A Yes. I did to buy chips and noodles. Shay 25 was the person who told me that we should keep some of</p>

<p style="text-align: right;">Page 150</p> <p>1 Q And United Inn is not on Old Dixie Highway. 2 Correct? 3 A Correct. 4 Q So is it accurate to say that on July 21, 5 2017, after you checked out of United Inn, you would 6 not have been physically present for the rest of the 7 day? 8 A Correct. 9 Q I'm going to hand you what I'm marking as 10 Defendant's Exhibit 31, which is Plaintiff 012235. 11 (Defendant Exhibit 31 was marked for 12 identification.) 13 In the middle of this page, July 21, 2017, 14 the 2:23 a.m. The message from you to a 404 number 15 stating, "Are you the police?" Is that correct? 16 A Correct. 17 Q And tell me again were you doing this on 18 your own volition? Or were you instructed to do this 19 by PD? 20 A He had instructed me at one point just to 21 ask people that. 22 Q And did he explain to you that the purpose 23 of that was that the police had to tell you if you 24 asked them if they were the police? 25 A Yes. That's what he told me.</p>	<p style="text-align: right;">Page 152</p> <p>1 fear of him at this point. He may have given us the 2 green light to go when we wanted, but that didn't 3 necessarily mean that we felt like we can leave. 4 Q Okay. Was there ever a time in this period 5 that you considered -- whether you were at the United 6 Inn or another hotel -- walking into the lobby and 7 saying, you know, I'm here against my will. Will you 8 please call the police? 9 A Like I said, especially like at the United 10 Inn and Suites, PD would disappear for 20 minutes at a 11 time every day. I had no idea whether or not he was 12 in cahoots with the people in the front desk. 13 The way that man let us back in our room 14 without asking us any questions that time, it seemed 15 like he knew the people up there. So I didn't feel 16 like I could ask them for help. 17 Q And when you say he would disappear for 15 18 or 20 minutes and come back, I mean, he'd just give 19 y'all the key and leave. Right? 20 A He didn't -- I don't even think he 21 had -- maybe he had to update the key or something 22 like that. I'm not sure. I just know he would take 23 our money and leave out the room and come back. 24 Q Did you ever see, yourself, PD communicating 25 with any employees or staff of the United Inn?</p>
<p style="text-align: right;">Page 151</p> <p>1 Q All right. I'm going to hand you what I'm 2 marking as Defendant's Exhibit 32. 3 (Defendant Exhibit 32 was marked for 4 identification.) 5 It's Plaintiff 007418. These are text 6 messages between you and PD. And there's a message to 7 you. It's entry 426 on July 21, 2017. But really 8 that's 11:02 p.m. on July 20, 2017. 9 And PD says to you -- I'm going to read it 10 out loud and ask you a few questions. "Baby girl I 11 believe there's strength in numbers. And numbers is 12 power. Unity is the way and networking is the key. 13 United we stand. Divided we shall fall. 14 "That's why anybody that wants to walk away 15 I let them because in this world it takes a team to 16 really achieve dreams. Everybody needs somebody and 17 there's somebody for everybody. God made pimps so a 18 ho can have a man..." End of message. 19 So you know, Ms. G.W., I'm seeing from PD 20 this message that, you know, anyone is free to go at 21 any time. Is that the way you felt as of July 20, 22 2017? 23 A No. At this point I had watched PD slap 24 Shay to the ground and step his foot on her neck for 25 not giving him enough money, so I was definitely in</p>	<p style="text-align: right;">Page 153</p> <p>1 A Yes. I communicated with the staff. Who 2 else did you ask? 3 Q I asked if you had ever seen PD communicate 4 with anybody, with any employee or staff member of 5 United Inn and Suites. 6 A No. I didn't. 7 Q Okay. All right. So we looked at earlier, 8 Ms. G.W., that on July 21st you were on Dixie Highway 9 or at another hotel and not the United Inn. You don't 10 think you came back to the United Inn on that 11 Saturday, July 22, 2017. Did you? 12 A No. Not to my knowledge. 13 Q So to your knowledge, you were never 14 physically present at the United Inn on July 22, 2017? 15 A No. 16 Q And then of course July 23, 2017, is when 17 you were raped and robbed. Is that correct? 18 A Correct. 19 Q And that was at a hotel in Jonesboro? 20 A Correct. 21 Q So on July 23, 2017, it's accurate to say 22 that you were never physically present at the United 23 Inn and Suites? 24 A Correct. 25 Q It sounds like, Ms. G.W., when you're</p>

<p style="text-align: right;">Page 158</p> <p>1 220, 221, 222, 134, 135, 136, 234, 235, 236, among 2 others.</p> <p>3 "Plaintiff had sex for money with at least 4 30 adult men over the period she was at the United Inn 5 and Suites. Plaintiff did not retain any of the money 6 that sex buyers paid her in exchange for sex.</p> <p>7 "Zaccheus Obie or his associates came to the 8 room in which plaintiff was trafficked and collected 9 the money that plaintiff, G.W., and plaintiff, A.G., 10 received from sex buyers. Zaccheus Obie and his 11 associates kept the money. Zaccheus Obie took some of 12 the money to the front office to pay cash for the 13 rooms in which plaintiff was trafficked."</p> <p>14 All right. So, Ms. G.W., we spent a lot of 15 time today going through all these dates. And I 16 believe, based on your testimony, you stayed at the 17 United Inn on June 24th, June 25th, checked out on 18 June 26th.</p> <p>19 A And June 23rd.</p> <p>20 Q Excuse me. Thank you.</p> <p>21 A You're welcome.</p> <p>22 Q And you had told me at the very beginning 23 there were three separate times. Do you remember 24 that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 160</p> <p>1 A Correct.</p> <p>2 Q Now that we've sorted all this out, gotten 3 all the dates down, do you still believe that number 4 is accurate?</p> <p>5 A Yes. I do.</p> <p>6 Q Okay. When you say Zaccheus Obie or his 7 associates, tell me everybody that you can remember 8 who you would consider an associate of who we've been 9 calling PD.</p> <p>10 A I would say Kiki. I would say Doc. I would 11 say his mother. I would say his sister. And I'm not 12 sure if there was associates in the hotels that we 13 stayed at. 'Cause it seemed to be, like, he knew 14 where he was taking us for a reason. So I don't know 15 if he knew the people at the hotels.</p> <p>16 Q And there's also that female that picked you 17 up the first time who you don't know?</p> <p>18 A Yes. Her also.</p> <p>19 Q The last sentence of this paragraph says, 20 "Zaccheus Obie took some of the money to the front 21 office to pay cash for the rooms in which plaintiff 22 was trafficked." You never saw him do that. Did you?</p> <p>23 A I saw him take our money. But I never seen 24 him, like, directly go into the office.</p> <p>25 Q Okay. And I know I've asked you this, but I</p>
<p style="text-align: right;">Page 159</p> <p>1 Q So that would be the first. Right?</p> <p>2 A Correct.</p> <p>3 Q All right. Second would be July 2nd, July 4 3rd, check out July 4th?</p> <p>5 A Correct.</p> <p>6 Q All right. And then the third was July 7 20th, checkout July 21st. Correct?</p> <p>8 A Correct.</p> <p>9 Q Are you sure you don't want to take a few 10 minutes?</p> <p>11 A I'm okay.</p> <p>12 Q All right. So not counting the days that 13 you checked out, I've got that as a total of six 14 nights. And that's not counting the days that you 15 checked out.</p> <p>16 It says in these -- and I want to be clear 17 about this, Ms. G.W., I'm not sitting here trying to 18 call you a liar. I just am trying to get all the 19 information I can. Okay?</p> <p>20 A Okay.</p> <p>21 Q So and from my perspective, I'm looking at 22 this. All right. There's six nights at the United 23 Inn and Suites. If your response says you had sex for 24 money with at least 30 adult men over that period, 25 that would be five or more per night just on average.</p>	<p style="text-align: right;">Page 161</p> <p>1 can't remember what your answer was. Did PD -- did 2 he -- do you know, did he have fake IDs?</p> <p>3 A I'm not sure.</p> <p>4 Q And then this next paragraph talks about at 5 least 30 men. Then the next sentence says, "Once in 6 the United Inn and Suites, five adult men purchased 7 commercial sex with plaintiff and the other minor with 8 whom plaintiff was sex trafficked. The five adult men 9 had sex with the minor victim simultaneously.</p> <p>10 "A fight ensued which spilled out into the 11 United Inn and Suites open air hallway and caused 12 significant commotion. The other minor with whom 13 plaintiff was trafficked threatened to pepper spray 14 the men."</p> <p>15 Is that -- is this the Haitian group?</p> <p>16 A No. This is the Hispanic group of men, the 17 first five that came with that boy that we had met who 18 was driving. So it was six men.</p> <p>19 Q And I know -- who did the fight ensue 20 between?</p> <p>21 A I would say probably more so me versus them 22 because I was more outspoken than A.G., so I was more 23 of the one who told them to get out because they were 24 being too aggressive with us. So I would say more so 25 me.</p>

<p style="text-align: right;">Page 162</p> <p>1 Q Okay. And then it says, "Another time at 2 the United Inn and Suites, five adult men purchased 3 commercial sex with plaintiff and the other minor with 4 whom plaintiff was sex trafficked. The five adult men 5 had sex with both minor victims simultaneously. 6 "After the five adult men left plaintiff's 7 room, the men stood in the open air hallway banging on 8 the door and demanding the minors allow them back into 9 the room."</p> <p>10 A Okay. Well, so I think fight was 11 first -- was with the Haitian men. And this was with 12 the Hispanic men.</p> <p>13 Q Okay. Yeah. And the reason I asked you the 14 first -- I remember you saying something about pepper 15 spray with the Haitian men.</p> <p>16 A Mm-hmm. Yes.</p> <p>17 Q Okay. So and am I correct? Was this on the 18 same night?</p> <p>19 A Yes. It was.</p> <p>20 Q And then at the -- do you remember timewise 21 whether it was the Haitian men happened first or the 22 Mexican group happened first?</p> <p>23 A The Mexican group was first.</p> <p>24 Q And tell me again roughly what time of day 25 that was.</p>	<p style="text-align: right;">Page 164</p> <p>1 A Yes. We did. How I was on the back side, 2 and me and Shay had -- first they had came up in our 3 room, and we had sex with them. And then they had 4 tried -- they ended up coming back drunk later in the 5 night, calling at first but I didn't answer the phone. 6 I wasn't -- I don't know. Maybe I answered. 7 I don't know. But we weren't letting them back up in 8 our room.</p> <p>9 Q Got you. Tell me about Kikia Anderson. I 10 was at the criminal sentencing for her and for the 11 Obies when you read that statement. Did you think she 12 was a victim? Or do you think she was a part of this 13 trafficking scheme?</p> <p>14 A I would say both. I would give her grace 15 because people deserve that. And she deserves the 16 same grace that me and Alyssa deserve and every other 17 young girl. So I would never criminalize her and take 18 away what she experienced as well.</p> <p>19 But she was a part of the people who 20 victimized us. And she was a part of the people who 21 trafficked us.</p> <p>22 Q Do you think she had an emotional connection 23 to PD?</p> <p>24 A Yes. I do.</p> <p>25 Q Do you think she considered PD her</p>
<p style="text-align: right;">Page 163</p> <p>1 A I would say them closer to about 7:00 or 2 8:00 p.m.</p> <p>3 Q And then what about the Haitians just 4 roughly speaking?</p> <p>5 A Between 10:00 and 12:00 a.m.</p> <p>6 Q And y'all are in Room 112?</p> <p>7 A Yes. Correct.</p> <p>8 Q And then in either of these two events with 9 the group of men, did you ever see any staff from 10 United Inn and Suites?</p> <p>11 A I don't think so. But I'm not necessarily 12 sure.</p> <p>13 Q I mean, during both of these you stayed in 14 your hotel room. Is that correct?</p> <p>15 A I would say with the Hispanic men we 16 probably came out into the hallway at one point. But 17 not with the Haitian men.</p> <p>18 Q And then on another occasion two drunk men 19 were screaming at plaintiff and another woman from the 20 parking lot demanding that they be allowed up to have 21 sex for money.</p> <p>22 A Yes.</p> <p>23 Q When did that happen?</p> <p>24 A The last time I was there.</p> <p>25 Q And did we talk about that?</p>	<p style="text-align: right;">Page 165</p> <p>1 boyfriend?</p> <p>2 A Maybe.</p> <p>3 Q Is the first time that you met Kikia 4 Anderson when she picked you up in Commerce and took 5 you to the United Inn on July 20th?</p> <p>6 A No. I think the first time I met her was 7 the time -- the day after -- or like the day we left 8 the United Inn that second time I was there. I think 9 she was with PD when he picked us up. Or no. He 10 picked us up and took us to his mom's house, and she 11 ended up coming over to his mom's house that day.</p> <p>12 Q Do you think Ms. Moody, PD's mom, knew what 13 was going on?</p> <p>14 A Yes.</p> <p>15 Q Did she ever do anything to try to stop it?</p> <p>16 A No.</p> <p>17 Q Going to page 5 of these responses. Do you 18 want to take a couple minutes?</p> <p>19 A No. I don't want to.</p> <p>20 Q Okay. You let me know if you do. Okay?</p> <p>21 A Okay.</p> <p>22 Q The third full sentence says, "Plaintiff's 23 traffickers relied upon force, fraud, coercion, 24 threats, intimidation, affection, and manipulation to 25 control and traffic plaintiff. Some of plaintiff's</p>

<p style="text-align: right;">Page 166</p> <p>1 traffickers were physically violent towards plaintiff 2 and/or women in front of plaintiff."</p> <p>3 You told me about PD being violent towards 4 Shay. Right?</p> <p>5 A Correct.</p> <p>6 Q Was PD ever violent toward you?</p> <p>7 A He would get frustrated sometimes with me, 8 but he was going -- he was in almost -- he was almost 9 violent with me that day that I was rescued. He was 10 interrupted by the police when we pulled in the 11 parking lot.</p> <p>12 Q Tell me about that group of Obie and his 13 associates that we were talking about. Who did you 14 see of that group carrying guns?</p> <p>15 A Kiki. She had, I think, a license to carry 16 'cause she carried it on her hip.</p> <p>17 Q Did you ever see PD with a gun?</p> <p>18 A I would say she left him with her -- he 19 drove her car sometimes. So she would leave her gun 20 in the car sometimes.</p> <p>21 Q Did you ever see adult men at the United Inn 22 and Suites openly carrying guns?</p> <p>23 A Like the men that were staying at the 24 hotels. Yes. Like, the men who would stand next to 25 their doors with their door open and I'm assuming -- I</p>	<p style="text-align: right;">Page 168</p> <p>1 A Zaccheus would always say that chain gang 2 was calling him. And now that I got older I know that 3 chain gang is like gangs in jail. So he would always 4 get phone calls from them.</p> <p>5 And I know one time Shay was -- that time 6 that she had rolled around with him when they -- she 7 had mentioned something about chain gang. So I just 8 always would hear him say chain gang. And I would see 9 chain gang call him on his phone.</p> <p>10 Q And your understanding is that means people 11 in prison?</p> <p>12 A Yes. Also I think one time Shay -- Shay 13 knew who Doc was like from their neighborhood or 14 something like that. So I feel like Shay had told me 15 that they were in a gang or something like that. Or 16 that Doc was. And I just, kind of, assumed that Z was 17 also.</p> <p>18 Q Did she ever say what gang?</p> <p>19 A No. She didn't tell me which one.</p> <p>20 Q You had told me earlier that there was a 21 one-time occurrence that you had sexual intercourse 22 with PD. Do you remember when that was?</p> <p>23 A I think it was July 22nd of that year.</p> <p>24 Q Okay. So the night before you got raped and 25 robbed?</p>
<p style="text-align: right;">Page 167</p> <p>1 would assume selling drugs. 'Cause I know we bought 2 weed from one of them one time.</p> <p>3 Q At the United Inn?</p> <p>4 A Yes.</p> <p>5 Q Do you remember what his name was?</p> <p>6 A No. I know it was when me and Shay were 7 staying in the back side.</p> <p>8 Q Do you remember what room?</p> <p>9 A If me and Shay were staying, like, right 10 here, it was like on the same level but across. Like 11 on the corner.</p> <p>12 Q The last sentence in that paragraph says, 13 "Plaintiff suspects her traffickers were affiliated 14 with the criminal gangs."</p> <p>15 And, Ms. G.W., I want to remind you 16 that -- I've told you this before but I just want make 17 sure we're clear. There's a protective order entered 18 in this case. So everything you're saying right now 19 and everything we're talking about is under seal and 20 it's going to stay under seal.</p> <p>21 So I don't want you to be scared, 22 intimidated, or hindered from answering this question. 23 But tell me what information you've got that makes you 24 suspect that your traffickers were affiliated with 25 criminal gangs.</p>	<p style="text-align: right;">Page 169</p> <p>1 A Mm-hmm. The day before.</p> <p>2 Q And that was not at the United Inn.</p> <p>3 Correct?</p> <p>4 A Correct.</p> <p>5 Q The next paragraph says, "During the period 6 at issue plaintiff was regularly in common areas at 7 the United Inn and Suites. Example given, parking 8 lots, stairwells, breezeways, hallways, lobby, vending 9 machine area and sidewalks. During those periods 10 plaintiff was frequently around and observed by hotel 11 employees working at the hotel.</p> <p>12 Plaintiff recalls interacting with various 13 United Inn and Suites staff on virtually a daily basis 14 including but not limited to front desk staff, room 15 cleaning staff, and maintenance staff. Plaintiff does 16 not recall the names of the specific hotel employees."</p> <p>17 All right. Got to break down this 18 paragraph. So let's start with parking lots. So 19 there's a front parking lot and a back parking lot.</p> <p>20 Would you say that when you were at the United Inn and 21 Suites you would regularly spend time in the parking 22 lot?</p> <p>23 A Yes. Both front and back.</p> <p>24 Q And tell me, what would you do while you're 25 in the parking lot?</p>

<p style="text-align: right;">Page 170</p> <p>1 A I would say, like, especially like late 2 night you could just stand out there and somebody 3 would drive up slowly and ask what you're -- are 4 you -- what you looking for, kind of. Or, like, they 5 would approach you and wait for you to ask what 6 they're looking for I would say more so like that. 7 So we learned to do that to meet clients 8 like that. Just stand around in the parking lot and 9 make ourselves visible to cars pulling in the parking 10 lot.</p> <p>11 Q Okay. What about stairwells?</p> <p>12 A I would say stairwells also because there 13 would be men in the stairwells whether they stayed in 14 the hotel or they were leaving another woman's room. 15 Something like that.</p> <p>16 Q And then breezeway is, kind of, the same 17 thing?</p> <p>18 A I would say breezeway is more like -- like 19 not the stairs but, like, a spot that you can stand 20 under the area like -- I don't know how to describe 21 it. But the breezeway was, like, maybe where the 22 vending machines -- if they had a vending machine 23 would sit in the breezeway.</p> <p>24 I feel like there's like this little square 25 pocket place in United Inn where we just would gather</p>	<p style="text-align: right;">Page 172</p> <p>1 Q Would you also walk Memorial Drive? 2 A I mean, we did. I really say the most we 3 walked Memorial Drive was that very first day because 4 we didn't -- we walked for 12 hours and we didn't 5 necessarily meet anybody. So we didn't really 6 continue doing that.</p> <p>7 Q In June and July of 2017, did you ever tell 8 anybody that you were 17 years old?</p> <p>9 A No. I didn't.</p> <p>10 Q Is there any specific conversation that you 11 can recall with a staff member of United Inn? Now we 12 talked about on that first trip that you bought 13 condoms, and I believe that was from a black female. 14 And then I know that there was a time that there was a 15 lost key.</p> <p>16 A Yes.</p> <p>17 Q And I know that you don't know whether that 18 was the Indian man or the female, but --</p> <p>19 A I think -- that's why I say it -- to my 20 knowledge, I think it was two occasions. The first 21 one was with the female which she must have 22 just -- the one that Z talked to.</p> <p>23 And then the second time I remember 24 interacting with a male who was like -- I don't know 25 if he was Indian. He was a lighter tone man. And I'm</p>
<p style="text-align: right;">Page 171</p> <p>1 right there. Kind of -- it keep you, kind of, shaded 2 from seeing other people.</p> <p>3 Q Okay. And where that -- where you're 4 talking about, could you be seen from the lobby?</p> <p>5 A I think the lobby, yeah. You could be seen 6 from them 'cause I think that's what leads to the 7 lobby is, like, that breezeway.</p> <p>8 Q Okay. And then you said you weren't sure or 9 not if there's a vending machine area. If it was, is 10 that similar to the breezeway?</p> <p>11 A Mm-hmm.</p> <p>12 Q And then sidewalks. The sidewalk would be 13 on -- I keep on wanting to say Moreland. And it's not 14 Moreland. Is it?</p> <p>15 A Memorial.</p> <p>16 Q Memorial. Thank you. The sidewalk would be 17 on Memorial Drive. Correct?</p> <p>18 A When I think of sidewalk I -- I more think 19 of, like, the pavement of the hotel. Like maybe right 20 when you step outside of your hotel room, there's like 21 a sidewalk right there in front of you.</p> <p>22 Q Okay. So when you were at the United Inn 23 and Suites, you were basically walking around the 24 entire property?</p> <p>25 A Yes. The entire property.</p>	<p style="text-align: right;">Page 173</p> <p>1 pretty sure the reason we interacted with him is 2 'cause we had got locked out again when we were 3 staying on the back side of the hotel.</p> <p>4 Q Any other conversations that you can think 5 of with any staff from United Inn?</p> <p>6 A No. Not -- not to my knowledge.</p> <p>7 Q Okay. Back in June and July of 2017, when 8 you were at the United Inn, how in your opinion could 9 a staff member at United Inn and Suites have been able 10 to determine that you were 17 years old?</p> <p>11 A So for example, the little 11-year-old girl 12 that I nanny for, when I look at her I can see the 13 youth in her. When I look in her eyes, I can see the 14 innocence in her eyes.</p> <p>15 So I know there's no way that these adult 16 people did not see feel like we weren't children. 17 I know they didn't think we were grown women. We were 18 constantly having -- we didn't know how to be 19 prostitutes. We didn't know how to be any of these 20 things, so we weren't doing it the right way.</p> <p>21 We weren't being slick about it. We had 22 multiple men coming in and out of our hotel room 23 multiple times a day, from sun up to sun down. We 24 were dressed provocative. We were walking around the 25 hotel constantly with no clothes on. And it was just</p>

<p>Page 190</p> <p>1 We're off the record. 2 (Off the record.) 3 THE REPORTER: We are back on the 4 record at 4:29 p.m. Scan disk 2. 5 BY MR. STORY: 6 Q All right. Ms. G.W., we're back on the 7 record. We've taken a 10-minute break or so. And I 8 understand that there is some testimony you gave prior 9 today that after taking a break, thinking about it, 10 you'd like to provide some clarification on. 11 A Yes. I was in Room 222 the second time that 12 I was there. And I'm not sure of the room number for 13 the third time. 14 Q Okay. So the second time, which would have 15 been that July 2nd and 3rd -- 16 A Mm-hmm. 17 Q -- that's when you were in Room 222? 18 A Yes. 19 Q Okay. And then that July 20th to 21st, you 20 don't know what room you were in? 21 A Just on the back side is what I remember. 22 Q Okay. All right. If you could flip to page 23 17. We asked you to identify people that would just 24 have knowledge about this lawsuit. So I just want to, 25 kind of, go through people I don't know I'd like to</p>	<p>Page 192</p> <p>1 Q Tell me about -- we kind of disappeared on 2 this Swayzii who we -- is Quintavious. You met him on 3 June 21st that first time. Correct? 4 A Correct. 5 Q Did you ever see him again? 6 A No. I never saw him again. 7 Q We talked about Kikia Anderson. Was she 8 trafficked at all? 9 A According to the last time I seen her at 10 court, that's what it seemed. That he was doing the 11 same to her. 12 Q When is the last time you talked to Kikia 13 Anderson? 14 A I would say the last time I spoke with her 15 was July 23, 2017. But the last time I seen her was 16 at her sentencing. 17 Q Okay. And then besides Doc checking you all 18 in that first time, did you see him anymore? 19 A Yes. He -- he came with Zaccheus to pick me 20 up from Commerce the second time. And he checked us 21 in again that time. 22 Q To United Inn? 23 A Yes. Correct. 24 Q Anything else? 25 A No.</p>
<p>Page 191</p> <p>1 ask you about. 2 While I've got you here though I'm going to 3 be taking A.G.'s deposition tomorrow. Do you have any 4 information about what happened to her that you think 5 is helpful? 6 A Like damages that's happened? Like -- 7 Q Anything you witnessed. 8 A Okay. I witnessed her get assaulted in the 9 hotel at United Inn and Suites. And I was -- that 10 would be the biggest thing I would say. She was 11 assaulted while we was there. 12 Q Is that the slap by the Haitian men? 13 A Mm-hmm. 14 Q Did you -- you didn't see it though because 15 you were in the restroom. Right? 16 A Yes. 17 Q Did you hear it? 18 A I heard the commotion from it. 19 Q Okay. Anything else that A.G. would know 20 about what happened to you that we haven't already 21 talked about today? 22 A Not that I can think of. 23 Q Okay. And of course, Zaccheus Obie is who 24 we've been referring to as PD? 25 A Correct.</p>	<p>Page 193</p> <p>1 Q What about Zaccheus' mother? What 2 information would she have? 3 A She probably would know who all his girls 4 were. She would do our hair and prepare us for the 5 day. 6 Q Did she give you any clothes? 7 A Yes. And makeup. 8 Q Did she give you any shoes? 9 A Not that I can think of. 10 Q What about Zaccheus Obie's sister? We 11 talked about her earlier. I can't remember what we 12 talked about though. 13 A She would also do our hair and makeup. Like 14 the day Shay had to work at that strip club. They 15 gave -- they gave Shay something to wear and did her 16 hair and makeup for that. 17 Q Do you know if Obie's sister was performing 18 commercial sex? 19 A Not to my knowledge, but she could have 20 been. 21 Q And then we've got Zaccheus Obie's nephew 22 twice. Do you know who that is? 23 A I just know he had two nephews that were at 24 his -- at his mom's house every time we came over. 25 And they were also at court when he was being</p>

<p style="text-align: right;">Page 210</p> <p>1 paid DeKalb County police officers to come and provide 2 security services at the premises at night. Do you 3 recall seeing police officers when you were at the 4 United Inn? 5 A No. I don't. 6 Q Other than the innocence in your eyes at 17 7 years old and 11 months, how else in your opinion 8 could an employee at United Inn determined that you'd 9 not yet turned 18? 10 A From my appearance, from the way I spoke, 11 from the lack of, like -- the way I wasn't as 12 concerned about my surroundings. I just, like, was 13 walking around inviting whoever into my room. I 14 think, like, the way I presented myself made me seem 15 young. 16 Q Did you look different than Shay? 17 A Yes. I did. 18 Q How? 19 A I looked younger in the face than she did. 20 Shay had a three year old child also. 21 Q What do you mean by the way you spoke meant 22 you were 17 instead of 18? 23 A Like, I would say like the conversation. 24 More so like the conversations that I had or my -- by 25 my conversations. I wasn't, like, knowledgeable about</p>	<p style="text-align: right;">Page 212</p> <p>1 No. I would say that. 2 Q What medical help do you think you need? 3 A Counseling. 4 Q Has a medical provider told you that? 5 A That I need counseling? 6 Q Yes. 7 A Yes. At The Cottage. 8 Q And The Cottage, do they provide counseling? 9 A They -- I don't think they provide 10 counseling. Like, The Cottage was for if you, like, 11 are a victim of sexual assault, they'll help you file 12 a police report. They'll take you to the county you 13 were assaulted in and stuff like that. They're not 14 like a therapist or nothing like that. 15 Q Okay. So you think you need therapy? 16 A Yes. 17 Q Who told you that's a medical provider that 18 you need therapy or counseling? 19 A The woman who gave me the medical leave that 20 year of 2018. She recommended me to see a therapist. 21 Q As you sit here today are you on any 22 medications? 23 A No. I'm not. 24 Q Do you have any current appointments 25 scheduled with a therapist?</p>
<p style="text-align: right;">Page 211</p> <p>1 something like an older person would be. 2 Q But those were conversations with customers, 3 not employees of United Inn. Correct? 4 A Okay. So I'll take back how I spoke then. 5 Q Okay. And then you said just not concerned 6 about your surroundings, letting people into your 7 hotel room? 8 A Correct. 9 Q Shay would also let people into her hotel 10 room. Correct? 11 A Correct. 12 Q Other than you told me about one time buying 13 condoms and that you bought snacks, and then you think 14 there was two times that you had to get a key, were 15 there any other times that you were in United Inn's 16 lobby? 17 A So I bought snacks multiple times. Okay. 18 So no. No other reasons besides those reasons. 19 Q And just to be fair to you, you're saying 20 there wasn't just one time you went in to buy snacks? 21 A Correct. 22 Q Have you incurred any medical bills as a 23 result of your injuries from June and July of 2017? 24 A No. I can't afford to get the proper 25 medical help that I need because of that situation.</p>	<p style="text-align: right;">Page 213</p> <p>1 A No. Not currently. 2 Q Do you have any current appointments with a 3 counselor? 4 A No. 5 Q You'd said earlier that PD was familiar with 6 these hotels that you were being taken to. How do you 7 know that he was familiar with them? 8 A For example, like the United Inn and Suites, 9 he brought me there multiple times. There were 10 certain hotels he would go back to multiple times. 11 Q Other than going back multiple times, is 12 there anything else he did that made you think he's 13 familiar with these places? 14 A No. Not to my knowledge. 15 Q I'm going to mark as Defendant's Exhibit 34. 16 I'm going to hand to you is a series of pictures. 17 (Defendant Exhibit 34 was marked for 18 identification.) 19 So in your -- in the FBI file for the 20 criminal prosecution of Zaccheus Obie they collected 21 all the data from your phone and got your locations of 22 where you were during that time and found several 23 hotels that you'd been taken to. 24 So I'd just like to show you -- I'll be 25 honest with you -- pictures that I found on Google to</p>